

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In Re	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS INC., et al.,	:	Case No.: 08-13555 (SCC)
	:	
Debtors.	:	(Jointly Administered)
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**[PROPOSED] ORDER GRANTING MOTION OF R. KYLE KETTLER FOR
CLARIFICATION, OR ALTERNATIVELY, PARTIAL RECONSIDERATION, AND
CORRECTION OF ORDER SUSTAINING OMNIBUS OBJECTIONS AND
RECLASSIFYING CLAIMS FOR RESTRICTED STOCK UNITS
AND CONTINGENT STOCK AWARDS**

Upon the motion dated November 21, 2014 (the “Motion”)¹ of R. Kyle Kettler seeking entry of an order pursuant to Rules 59 and 60 of the Federal Rules of Civil Procedure, as made applicable hereto by Bankruptcy Rules 9023 and 9024, clarifying, or alternatively, partially reconsidering, and correcting the Order Sustaining Omnibus Objections and Reclassifying Claims For Restricted Stock Unites and Contingent Stock Awards (the “Reclassification Order”) [Docket No. 46853]; and due and proper notice of the Motion having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Motion is proper and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Motion is granted; and it is further

¹ All capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in the Motion.

ORDERED that the Reclassification Order is hereby clarified and amended so that it applies only to RSU Claimants with RSU Claims and not to any claimants, including Kettler, who were not paid what they were owed either in cash or in conditional equity awards, including RSUs, prior to the Petition Date; and it is further

ORDERED that Kettler's entire claim shall be stricken from Exhibit 1 to the Reclassification Order and reinstated on the official claims register in this case to its prior position, in the full amount of \$350,000, with the same priorities asserted in the proof of claim; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation and/or interpretation of this Order.

Dated: New York, New York
_____, 2014

HONORABLE SHELLEY C. CHAPMAN,
UNITED STATES BANKRUPTCY JUDGE